



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Jacob K. Javits Federal Building  
26 Federal Plaza  
New York, New York 10278*

May 7, 2025

**BY ECF**

The Honorable Loretta A. Preska  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Israel Evangelista*, 24 Cr. 629 (LAP)**

Dear Judge Preska:

The Government respectfully requests that the Court seal Exhibits A, B, and C attached to the Government's publicly filed sentencing memorandum in this case. (ECF 22). As described in the Government's letter, Exhibit A is a copy of Evangelista's BOP medical records; Exhibit B is a copy of Evangelista's BOP disciplinary history; and Exhibit C is a copy of an incident report associated with Evangelista's BOP disciplinary history. Although Exhibits A, B, and C are judicial documents to which the presumption of public access attaches, *see United States v. Amodeo*, 44 F.3d 141, 146 (2d Cir. 1995), the Government respectfully submits that the presumption is outweighed by the countervailing interests of the defendant's privacy and the sensitivity of prison administration. *See United States v. Pabon*, No. 17 Cr. 312 (JPC), 2021 WL 603269, at \*3 n.4 (S.D.N.Y. Feb. 16, 2021) (sealing "further content" of defendant's medical records based on defendant's privacy interests); *United States v. Monge*, No. 17 Cr. 611 (AT), 2020 WL 3872168, at \*1 n.1 (S.D.N.Y. July 9, 2020) (sealing BOP medical records beyond publicly referenced portions of those records); *United States v. Davidson*, No. 15 Cr. 288 (RMB), 2022 WL 484829, at \*4 (S.D.N.Y. Feb. 17, 2022) (granting government's motion to seal defendant's BOP medical records and BOP disciplinary records).

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Accordingly, the Government respectfully requests that the Court grant its motion to seal Exhibits A, B, and C attached to ECF 22.

Respectfully submitted,

JAY CLAYTON  
United States Attorney

By:

  
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Assistant United States Attorney  
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cc: Counsel of Record (via ECF)

The Government's request to file Exhibits A, B, and C under seal is GRANTED. The Clerk of the Court shall close docket number 23.

**SO ORDERED.**

Dated: May 12, 2025

  
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LORETTA A. PRESKA, U.S.D.J.